

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SANDY JO BATTISTA,

**Plaintiff,**

v.

**C. A. No. 05-11456-DPW**

KATHLEEN M. DENNEHY, et al.,

**Defendants.**

**DEFENDANTS' MOTION FOR LEAVE TO FILE A  
MEMORANDUM OF LAW IN EXCESS OF TWENTY PAGES**

Defendants, Kathleen M. Dennehy, Robert Murphy, Susan Martin, Steven Fairly and Gregory Hughes, through counsel, pursuant to Local Rule 7.1(B)(4), hereby move for leave to file a memorandum of law in support of their opposition to plaintiff's motion for a preliminary injunction in excess of twenty pages, as follows:

1. The issues raised in this action are numerous and complex and require a thorough analysis. In particular, plaintiff's complaint alleges a violation of his constitutional rights with regard to treatment for his gender identity disorder.

2. The defendants request leave to file a memorandum of law in support of motion to dismiss not to exceed twenty-two pages.

WHEREFORE, defendants respectfully request leave to file a memorandum of law not to exceed twenty-two pages.

Dated: July 22, 2005

Respectfully submitted,

NANCY ANKERS WHITE  
Special Assistant Attorney General

/s/ Richard C. McFarland

---

Richard C. McFarland (BBO# 542278)  
Legal Division  
Department of Correction  
70 Franklin Street, Suite 600  
Boston, MA 02110-1300  
(617) 727-3300, Ext. 132